

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**
Civil Action No. _____

BELL NORTHERN RESEARCH, LLC,

Plaintiff,

v.

HMD AMERICA, INC., HMD GLOBAL
OY, SHENZHEN CHINO-E
COMMUNICATION CO. LTD., HON HAI
PRECISION INDUSTRY CO., LTD,
TINNO MOBILE TECHNOLOGY CORP.,
SHENZHEN TINNO MOBILE CO., LTD.,
TINNO USA, INC., UNISOC
TECHNOLOGIES CO. LTD.,
SPREADTRUM COMMUNICATIONS
USA, INC., WINGTECH TECHNOLOGY
CO. LTD., WINGTECH
INTERNATIONAL, INC., HUAQIN CO.
LTD., BEST BUY CO., INC., BEST BUY
STORES L.P., TARGET CORP.,
WALMART INC.,

Defendants.

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Bell Northern Research, LLC (“BNR” or “Plaintiff”), for its Complaint against Defendants HMD America, Inc. and HMD Global Oy (collectively, “HMD” or “Defendant”) and Defendants Shenzhen Chino-E Communication Co. Ltd. (“Chino-E”), Hon Hai Precision Industry Co. (“Hon Hai”), Tinno Mobile Technology Corp. and Shenzhen Tinno Mobile Co., Ltd. and Tinno USA, Inc., (collectively, “Tinno”), Unisoc Technologies Co. Ltd. and Spreadtrum Communications USA Inc. (collectively, “Unisoc”), Wingtech Technology Co. Ltd. and Wingtech International, Inc. (collectively, “Wingtech”), Huaqin Co. Ltd. (“Huaqin”), Best Buy Co., Inc. and Best Buy Stores L.P. (collectively, “Best Buy”), Target Corporation (“Target”), and

Walmart Inc. (“Walmart”) (individually each a “Defendant” and collectively “Defendants”) alleges the following:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*

THE PARTIES

2. Plaintiff BNR is a limited liability company organized under the laws of the State of Delaware with a place of business at 401 North Michigan Avenue, Chicago, Illinois 60611.

3. Upon information and belief, Defendant HMD America, Inc. is a corporation organized and existing under the laws of the State of Florida, with its principal place of business at 1200 Brickell Ave., Suite. 510, Miami, Florida 33131. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services that into the stream of commerce and that incorporate infringing technology knowing that they would be sold in this judicial district and elsewhere in the United States.

4. Upon information and belief, Defendant HMD Global Oy is a corporation organized and existing under the laws of Finland, with its principal place of business at Bertel Jungin aukio 9, 02600 Espoo, Finland. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

5. Upon information and belief, Defendant Shenzhen Chino-E Communication Co., Ltd. is a corporation organized and existing under the laws of China, with its principal place of business at 139 Lixiang Road, Songmushan Dalang Town, Dongguan, 523770, China. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

6. Upon information and belief, Defendant Hon Hai Precision Industry Co., Ltd. is a corporation organized and existing under the laws of China, with its principal place of business at No.2, Ziyou St., Tucheng Dist., New Taipei City 236, Taiwan. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

7. Upon information and belief, Defendant Tinno Mobile Technology Corp. is a corporation organized and existing under the laws of China, with its principal place of business at 23/F, TINNO Building, No.33, Xiandong Rd, Xili, Nanshan District, Shenzhen, China. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

8. Upon information and belief, Defendant Shenzhen Tinno Mobile Co., Ltd. is a corporation organized and existing under the laws of China, with its principal place of business

at 23/F, TINNO Building, No.33, Xiandong Rd, Xili, Nanshan District, Shenzhen, China. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

9. Upon information and belief, Defendant Tinno USA, Inc. is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business at 2301 W. Plano Parkway, Suite 102, Plano, Texas, 75075. Upon information and belief, Tinno USA, Inc. is a wholly owned subsidiary of Tinno Mobile Technology Corp. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

10. Upon information and belief, Defendant Unisoc Technologies Co., Ltd. is a corporation organized and existing under the laws of China with its principal place of business at Building 1, Zhanxun Center, Lane 2288, Zuchongzhi Road, Pudong New Area, Shanghai, 201203, China. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

11. Upon information and belief, Defendant Spreadtrum Communications USA Inc. is a corporation organized and existing under the laws of the State of Delaware with its principal place of business at 2674 N 1st St., San Jose, California, 95134. Upon information and belief,

Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

12. Upon information and belief, Defendant Wingtech Technology Co., Ltd. is a corporation organized and existing under the laws of China, with its principal place of business at No. 777, Subcentral Road, Nanhu District, Jiaxing, Zhejiang Province, China. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

13. Upon information and belief, Defendant Wingtech International, Inc. is a corporation organized and existing under the laws of the State of California, with its principal place of business at 21900 Oakview Ln., Cupertino, California, 95014. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

14. Upon information and belief, Defendant Huaqin Co. Ltd. is a corporation organized and existing under the laws of China, with its principal place of business at Building 1 & 9 & 11, NO.399 Keyuan Road, Zhangjiang Hi-Tech Park, Pudong New District, Shanghai, China. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.